

# **EXHIBIT**

## **H**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE  
OF MEDICINE, a foreign corporation,

Plaintiff,

United States District Court Judge  
Patrick J. Duggan, presiding  
Michael Hluchaniuk, referral  
Case No.: 2:10-cv-10978

V

STEVEN L. WOODWARD,

Defendant.

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Eric A. Buikema (P58379) CARDELLI, LANFEAR & BUIKEMA, P.C. Attorneys for Plaintiff 322 W. Lincoln Royal Oak, MI 48067 (248) 544-1100 ebuikema@cardellilaw.com	STEVEN L. WOODWARD In Pro Per c/o 7211 Brittwood Lane Flint, MI 48507 Steve_L_woodward@yahoo.com
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**Affidavit of Neal Simon**

I am an adult and have personal knowledge and can competently testify to the following facts:

1. I am the President of the American University of Antigua College of Medicine ("AUA").
2. AUA does not falsify student grades.
3. AUA does not commit fraud upon its students.
4. AUA does not disregard its students' civil rights.
5. AUA does not conspire against its students.

6. AUA has at all relevant times had USMLE pass rate higher than 22.9%.
7. AUA did not contrive false evidence in the disciplinary hearings against Steven Woodward.
8. AUA professors do not teach students wrong information and instead provide a first-rate medical education.
9. AUA has not committed any criminal activities.
10. AUA has suffered damages stemming from the Defendant's publication of his website [www.aua-med.com](http://www.aua-med.com).

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Neil Simon  
President, American University of Antigua  
College of Medicine.

Subscribed and sworn to before me this  
\_\_\_\_\_ day of \_\_\_\_\_, 2011.

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Notary Public  
My commission expires: